

# **EXHIBIT D**

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA

ASHEVILLE DIVISION

CARYN DEVINS STRICKLAND,	)	
	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	Civil No. 1:20-cv-00066
	)	
UNITED STATES OF AMERICA, <i>et al.</i> ,	)	
	)	
<i>Defendants.</i>	)	
	)	
_____	)	

**PLAINTIFF’S FOURTH SET OF DOCUMENT REQUESTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff, by and through her attorney, requests that Defendants produce or make available for inspection and copying the following documents and electronically stored information (“ESI”) at a time and place agreed upon by the parties’ counsel, in accordance with the following Definitions and Instructions, within thirty (30) days of service of this request.

***DEFINITIONS***

1. ***And/or.*** The terms “and” and “or” shall be construed either conjunctively or disjunctively as necessary to bring within the scope of the request all responses that might otherwise fall outside the scope of the request.
2. ***Communication.*** The term “communication” means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).
3. ***Complaint.*** The term “civil complaint” means the complaint filed in the United States District Court for the Western District of North Carolina on March 3, 2020 (Docket No. 1:20-cv-00066). The term “EDR complaint” means the request for counseling and report of wrongful conduct submitted by Plaintiff to the Fourth Circuit Court of Appeals on September 10, 2018.
4. ***Concern or Concerning (or Relate or Relating).*** The terms “concern” or “concerning” (or “relate” or “relating”) mean, in addition to their usual and customary meanings, referring to, pertaining to, addressing, discussing, describing, regarding, evidencing, constituting, or otherwise having any logical or factual connection with the subject matter addressed.

“So again, I reached out to OGC and asked, what are you entitled to know about your reportable conduct? And in a very nice nutshell, basically this is now a disciplinary matter involving the court involving different offices. And you are not entitled to know that cause that’s private to the offices involved. So your involvement was to make the report on, which we do appreciate. But OGC has said that’s, you’re not entitled to update, you’re not entitled to know what the outcome is of these disciplinary matters.” 190507\_1621, at 11:40.

RESPONSE:

Document Request No. 80: The training videos referenced at Bates No. US3657, 3715-21, 6884.

RESPONSE:

Document Request No. 81: Documents concerning any expert witness whom Defendants expect to call at any hearing or trial in this matter, including, but not limited to, the following:

- (a) all written reports,
- (b) all documents which the expert reviewed to form any opinions,
- (c) the most recent resume or curriculum vitae of the expert,
- (d) any list of cases in which the expert has testified as an expert at trial or deposition,
- (e) any communication between Plaintiff or representatives for Plaintiff and the expert (other than communications protected from disclosure by Federal Rule of Civil Procedure 26(b)(4)(c)),
- (f) the current fee schedule for the expert, and
- (g) any bills or invoices generated by the expert in performing expert witness services for Plaintiff in this case.

RESPONSE:

Document Request No. 82: Documents concerning all final decisions relevant to Plaintiff's EDR proceeding associated with each assertion of "Deliberative Process Privilege" by Defendants in their "Privilege Log" served on March 24, 2023. *See, e.g.*, Bates Nos. US628, US1434, US1790, US1794, US1803, US2589, US3302, US4038, US4068, US4073, US5312).

RESPONSE:

Document Request No. 83: A copy of all versions of the Defender Organization Classification System (DOCs) Manual from 2018 to present.

RESPONSE:

This the 31st day of March, 2023.

/s/ Cooper Strickland  
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## CERTIFICATE OF SERVICE

I certify that on this 31st day of March, 2023, I have served this document by email on the following counsel for the opposing parties:

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